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COMMISSION  
GENERAL  
COUNSEL

2008 NOV 13 A 11:17

Clayton E. Woodrum  
Ben C. Kemendo  
Thomas C. Tate  
Terry J. Westemeir

12 November 2008

Mr. Jeff S. Jordan  
Supervisory Attorney-Complaints Examination  
& Legal Administration  
999 E. Street, NW  
Washington, DC 20463

Re: MUR # 6102-Oliver for Congress

Dear Sir:

This is in response to your letter dated October 28, 2008 regarding the complaint filed by Shane M. Saunders against Oliver for Congress the principal campaign committee of Georgianna Oliver. Ms. Oliver is responding under separate cover and this response is on behalf of me, treasurer of the committee.

Violation #1 asserts that Ms. Oliver made prohibited loans to her committee and failed to report the source of those loans. In support of his complaint he attached copies of newspaper articles which contain errors and omissions. He fails to include all of the articles and corrections that were printed.

It is my understanding from my investigation that all funds loaned to the campaign came from the personal funds of the candidate. The candidate's source of funds from which such loans were made included her Individual Retirement Account, distributions from her wholly owned S Corporation, Evergreen Solutions, Inc., and from her earnings from Evergreen Solutions. In her Personal Financial Statement filed with the House she included these assets placing a range of value on each one. Included as an asset of Evergreen Solutions, Inc. and therefore included in the value of Evergreen Solutions, Inc. was Accounts Receivable from AptBudget a related entity. AptBudget sold its assets to an unrelated party and subsequently paid the account it owed to Evergreen Solutions, Inc. The candidate later withdrew funds from Evergreen Solutions, Inc. and loaned these funds to the campaign. After payment of the account to Evergreen Solutions, Inc., AptBudget still owes additional funds to Evergreen Solutions, Inc. The candidate is free

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to withdraw funds form her wholly owned corporation at her discretion, and they become her personal funds which she is then permitted to loan to her campaign.

Violation #2 asserts that the candidate failed to properly disclose the purpose of certain disbursements. A review of the attachments to the complaint show an amount paid to Sheryl A. Lovelady in the amount of \$840.00 for "Reimbursements". The payment was a reimbursement for travel and lodging expenses. The other allegations as to improper description are not supported by any evidence or attachments.

No evidence has been provided to support these allegations other than unreliable newspaper articles. Reporters frequently have difficulty understanding complex financial transactions and often misreport them as occurred in this case.

Based upon the above stated facts I ask that the Commission take no for further action on this matter. If any of the information is unclear or if additional information is needed, please contact the undersigned.

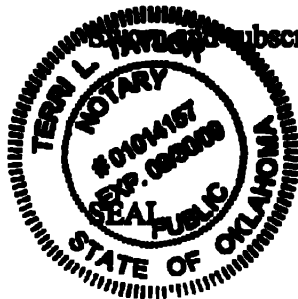
Very truly yours,



Clayton E. Woodrum  
Treasurer of the Oliver for Congress Campaign Committee

### **AFFIDAVIT**

I hereby swear under penalty of perjury that the above responses are true and correct to the best of my knowledge and belief.

  
Clayton E. Woodrum

subscribed to before me this 12 day of November 2008.

  
Notary Public

My commission expires: 9/30/09